

Exhibit C

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

ORANGEBOY, INC.,

Plaintiff,

v.

PATRON POINT, INC.,
Ohio Registered Agent Service, LLC
6545 Market Ave. North, #100
North Canton, OH 44721

and

DOES #1–5,

Defendants.

Case No. _____

Judge _____

DECLARATION OF JAIME HIRSCHFELD

1. I, Jaime Hirschfeld, am over the age of 18, am not under any disability, and am competent to testify to the facts stated below based on my personal knowledge.

2. I am the Sales Manager of OrangeBoy, Inc. One of my tasks as Sales Manager is to respond to requests for information submitted through OrangeBoy’s web site.

3. On June 2, 2020, I received one such request for information. At first glance, the request appeared to come from a real person at a real library. But when I tried to respond to the request, my email bounced back. I later learned that the name that this request was submitted under did not belong to a real library employee.

4. In my experience, fake names in our information request form are very rare.

5. On July 29, I received another request for information about Savannah. This request came from someone claiming to be “Sara Mortimer” from the “Saint Paul Library.” She asked for information about how Savannah handles messaging to library users. I answered her

initial question and a follow-up, then offered to explain more over the phone. The requester claimed that she was “on the Front Desk today,” and we continued discussing over email. Later, “Sara” asked for access to a demo site, and I again offered to schedule a time to talk. “Sara” again declined, claiming that she was on vacation the next week and asking for more information that she could look at during that vacation.

6. By this point, I was already suspicious about the person making these requests. I had tried to search the Internet for Sara Mortimer at the Saint Paul Library, so that I could learn more information about her position, the library’s current technology setup, and other facts that could help me sell Savannah. But I could not find any information about this person.

7. This last email showed that I was right to be suspicious. Before then, all of “Sara’s” emails came from the email address “stpaullibrary@outlook.com.” This email came from a different account, “Beth Ryan <beth.ryan100@gmail.com>.”

8. After receiving this message, I searched the Internet again. This time, I found two Twitter accounts that appear to be connected to this person, “St Paul Public Library” (<https://twitter.com/StPaulPublicLi1>) and “Beth Ryan” (<https://twitter.com/BethRya37389413>). Both accounts were created in May 2020, and since then have done nothing except retweet marketing messages from Patron Point’s Twitter account. Neither account has posted anything since June 29.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date:

8/20/2020


Jaime Hirschfeld